

Division of Securities  
Utah Department of Commerce  
160 East 300 South  
Box 146760  
Salt Lake City, UT 84114-6760  
Telephone: (801) 530-6600  
FAX: (801) 530-6980

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BEFORE THE DIVISION OF SECURITIES  
OF THE DEPARTMENT OF COMMERCE  
OF THE STATE OF UTAH

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IN THE MATTER OF:

HUNTERS CAPITAL, INC.  
PAUL LOUIS BOUCHARD  
DALE PARKES  
JARED HONE  
GERALD (JERRY) R. MARTIN  
CHRIS HORNE  
**CHANSE CARLSON**  
RICH RUSICK  
GREG Warburton  
JOEL SCHEER  
ISRAEL CURTIS  
RACHELLE TAYLOR

Respondents.

STIPULATION AND CONSENT  
ORDER

Docket No. SD-07-0092  
Docket No. SD-07-0093  
Docket No. SD-07-0094  
Docket No. SD-07-0095  
Docket No. SD-07-0096  
Docket No. SD-07-0097  
**Docket No. SD-07-0098**  
Docket No. SD-07-0099  
Docket No. SD-07-0100  
Docket No. SD-07-0101  
Docket No. SD-07-0102  
Docket No. SD-07-0103

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The Utah Division of Securities (the Division), by and through its Director of  
Enforcement, Michael Hines, and Chanse Carlson, hereby stipulate and agree as follows:

1. Chanse Carlson was the subject of an investigation conducted by the Division into allegations he they violated certain provisions of the Utah Uniform Securities Act (the Act), Utah Code Ann. § 61-1-1, *et seq.*, as amended.
2. In connection with that investigation, on November 27, 2007, the Division issued an Order to Show Cause to Hunters Capital, Inc., Paul Louis Bouchard, Dale Parkes, Jared Hone, Gerald R. Martin, Chris Horne, Chanse Carlson, Rich Rusick, Greg Warburton, Joel Scheer, Israel Curtis, and Rachelle Taylor. With respect to Hunters Capital, Inc. and Paul Louis Bouchard, the Division alleged they committed securities fraud and paid unlicensed agents compensation to introduce an investment in Hunters Capital to potential investors. With respect to Dale Parkes, Jared Hone, Gerald R. Martin, Chris Horne, Chanse Carlson, Rich Rusick, Greg Warburton, Joel Scheer, Israel Curtis, and Rachelle Taylor the Division alleges they offered and/or sold securities without a license.
3. Chanse Carlson and the Division have agreed to settle this matter by way of this Stipulation and Consent Order (Consent Order). The administrative actions against all other Respondents are currently pending.
4. Chanse Carlson admits the jurisdiction of the Division over him and over the subject matter of this action.
5. Chanse Carlson waives any right to a hearing to challenge the Division's evidence and present evidence on their behalf.

### THE DIVISION'S INVESTIGATIVE FINDINGS

From September 2007 to the present, the Division has been conducting an investigation into this matter which revealed:

6. Hunters Capital, Inc. (Hunters Capital) is not a registered entity in Utah.
7. Paul Louis Bouchard (Bouchard) resides in Utah County, Utah. At all times relevant to the matters asserted herein Bouchard held himself out to be a principal of Hunters Capital.
8. Chanse Carlson (Carlson) resides in Utah County, Utah.
9. Carlson received compensation of .5 - 1% of investor funds from Hunters Capital and Bouchard, in return for introducing investors to Hunters Capital.

### Licensing Violations

10. Carlson effected or attempted to effect purchases or sales of securities in Utah.
11. When effecting or attempting to effect purchases or sales of securities on behalf of Hunters Capital and Bouchard, Carlson was acting as an agent of an issuer.
12. Carlson has never been licensed to sell securities in Utah as an agent of this issuer, or any other issuer.

### THE DIVISION'S CONCLUSIONS

13. Based on the Division's investigative findings, the Division concludes that:

- a. Chanse Carlson effected or attempted to effect purchases or sales of Hunters Capital promissory notes and investment contracts, and those promissory note and investment contracts are securities under § 61-1-13 of the Act;
  - b. Chanse Carlson violated § 61-1-3 of the Act by effecting or attempting to effect purchases or sales of securities in Utah without a license.
14. Carlson admits the substance of the Division's investigative conclusions and consents to the Division entering an Order:
- a. Requiring Chanse Carlson to cease and desist from engaging in any further conduct in violation of the Utah Securities Act.
  - b. Requiring Chanse Carlson to pay a fine of ten thousand dollars (\$10,000) to the Division of Securities, payment of which will be waived in its entirety so long as:
    - i. Carlson violates no provisions of the Act for a term of three years;
    - ii. No later than February 29, 2008, Carlson disgorges to his investors the compensation he received from Hunters Capital and Bouchard, in the amount of three hundred dollars (\$300), or provides the Division with signed waivers (approved as to form by the Division) from Carlson's investors, stating that they waive the right to receive their portion of Carlson's commissions for all purposes and from all sources; and

- iii. Carlson provides continuing truthful testimony and cooperation (including production of documents) with any State or Federal investigation involving Hunters Capital or Bouchard.

If Carlson fails to abide by the terms of this Stipulation and Consent Order, the Division will give Carlson written notice of the violation, and the suspended fine will be due to the Division within one month of that notice.

- 15. Carlson acknowledges that this Consent Order, upon approval by the Division Director, shall be the final compromise and settlement of this matter. Carlson further acknowledges that if the Division Director does not accept the terms of the Consent Order, it shall be deemed null and void and without any force or effect whatsoever.
- 16. Carlson acknowledges that the Consent Order does not affect any civil or arbitration causes of action that third parties may have against Chanse Carlson arising in whole or in part from their actions, and that the Consent Order does not affect any criminal cause of action that a prosecutor might bring.
- 17. This Consent Order constitutes the entire agreement between the parties herein and supersedes and cancels any and all prior negotiations, representations, understandings, or agreements between the parties. There are no verbal agreements which modify, interpret, construe, or otherwise affect this Consent Order in any way.

18. Carlson represents that any information they have provided to the Division is accurate and complete to the best of their knowledge, and if the Division finds otherwise, Carlson acknowledges that this Consent Order will be deemed null and void and without any force or effect whatsoever.
19. Violation of this Consent Order is a third degree felony pursuant to § 61-1-21(1) of the Act.
20. Carlson has read this Consent Order, understands its contents, and enters into this Consent Order voluntarily.

Utah Division of Securities

Date: 2/9/07  
By: [Signature]  
Michael Hines  
Director of Enforcement

Respondent Carlson

Date: 2/4/08  
[Signature]  
Chanse Carlson

Approved:

[Signature]  
Scott Davis  
Assistant Attorney General

### **ORDER**

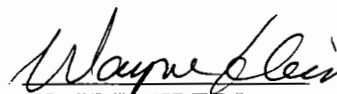
Pursuant to the terms of the Stipulation and Consent Order defined above, the Director of the Utah Division of Securities hereby orders that:

- a. Chanse Carlson CEASE and DESIST from engaging in any further conduct in violation of the Utah Securities Act.
- b. Chanse Carlson pay a fine of ten thousand dollars (\$10,000) to the Division of Securities, payment of which will be waived so long as:
  - i. Carlson violates no provisions of the Act for a term of three years;
  - ii. No later than February 29, 2008, Carlson either disgorges to his investors compensation he received from Hunters Capital and Bouchard, in the amount of three hundred dollars (\$300), or provides the Division with signed waivers (approved as to form by the Division) from Carlson's investors, stating that they waive the right to receive their portion of Carlson's commissions for all purposes and from all sources; and
  - iii. Carlson provides continuing truthful testimony and cooperation (including production of documents) with any State or Federal investigation involving Hunters Capital or Bouchard.

If Carlson fails to abide by the terms of this Stipulation and Consent Order, the

Division will give Carlson written notice of the violation, and the suspended fine will be due to the Division within one month of that notice.

DATED this 8<sup>th</sup> day of February, 2008.



WAYNE KLEIN

Director, Utah Division of Securities





**CERTIFICATE OF MAILING**

I hereby certify that on the 11th day of February 2008, I mailed, regular mail postage prepaid, a copy of the foregoing **Stipulation and Consent Order** to:

Chanse Carlson  
1174 East 830 South  
Pleasant Grove, UT 84062

A handwritten signature in black ink, appearing to read "Pam Anderson", written over a horizontal line.

Executive Secretary